# PSJ3 Exhibit 580



January 6, 2011

#### E-Mail and Express Mail

Paul Farley, Vice President National Accounts Cardinal Health 7000 Cardinal Place Dublin, Ohio 43017

RE: Cardinal Concerns About CVS # 0174, 1136, 2732, 2848 and 3639

Dear Paul:

CVS Caremark appreciates you meeting with us on December 2, 2010, and sharing your concerns about controlled substance purchases by several CVS pharmacies.

Since our meeting, CVS has undertaken actions to address your concerns about those specific pharmacies and to address suspicious ordering and dispensing generally. CVS has distributed guidelines that reinforce the company's position that pharmacists use their professional judgment when determining whether to fill prescriptions. The guidelines identify inappropriate prescription-seeking behavior and advise pharmacists how to minimize risk of dispensing for other than legitimate prescriptions.

CVS representatives also met with Drug Enforcement Administration and Florida Department of Health investigators regarding dispensing issues in Florida.

Teams of CVS Pharmacy Supervisors and Regional Loss Prevention Managers visited the following Florida pharmacies: CVS # 0174 (Daytona Beach), CVS # 1136 (Homestead), CVS # 2732 (Hollywood), CVS # 2848 (Pompano Beach) and CVS # 3639 (Bushnell). The teams interviewed pharmacy staff, reviewed controlled substance ordering, receiving and dispensing procedures, controlled substance records and reports, and security. The teams also audited certain drugs.

The teams found no evidence of controlled substance diversion or significant losses. CVS is confident that pharmacists and their staffs at these pharmacies understand how to minimize the risk of dispensing controlled substances, particularly opioids for pain management, for non-legitimate purposes.

CVS is comfortable with Cardinal continuing to ship controlled substances to these pharmacies and look forward to continuing to work with you to address matters of mutual concern. Please let me know if you still have concerns about these pharmacies or if you have concerns about others.

Sincerely,

Brian E. Whalen

Director, Pharmacy Merchandising

cc: Michael A. Mone – Cardinal Health

Karen O. Gibbs – CVS Caremark

Larry K. Houck - CVS Caremark

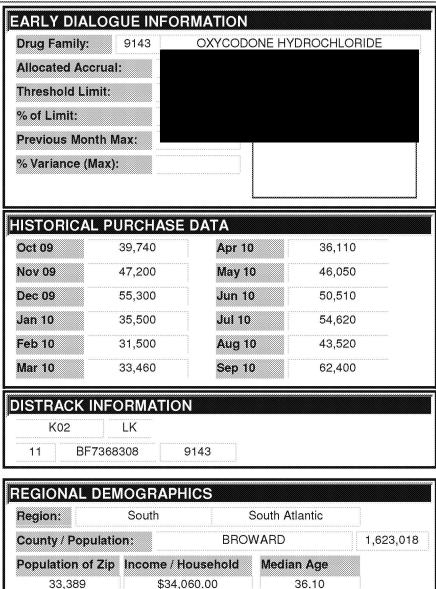
## Case: 1:17-md-02804-DAP Doc #: 2371-36 Filed: 08/14/19 4 of 14. PageID #: 386818 **Anti-Diversion Early Dialogue Profile**

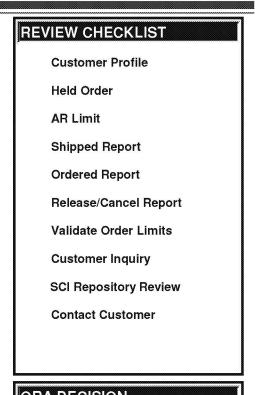
By Christopher J. Forst at 9:14 am, Oct 27, 2010

**EAST** 

BF7368308 HOLIDAY CVS, L.L.C.

DEA LICENSE INFORMATION			
DEA Number:	3F7368308		
Business Activity Code: A	3	CHAIN PHARMACY	
	22N 33N 4 5		
License Expiration Date:	20101231		
CUSTOMER INFORMATION			
HOLIDAY CVS, L.L.C.		DBA: CVS/PHARMACY # 028	48
2036 E. ATLANTIC BLVD.			
POMPANO BEACH	FL	33060 9547816785	9547816785
Dominant Accounting Class:	CHAIN PHARMA	CY CVS	
First Cardinal Account Created:	1/1/2001		
Visited by QRA / # of Visits / Mos	t Recent Visit:		
PURCHASE PROFILE			
The below metrics are aggregated based	2000	-	***
# of Drug Families Purchased:	45	Hydrocodone	4,585
Total Rx Sales (\$):		Oxyocodone	535,910
Control Substance (CS) Sales (\$)	:	Alprazolam	3,380
Rx Dosage Units Sold	1,072,389	Phentermine	600
CS Dosage Units Sold:	633,018	Carisoprodol	590
% CS Purchases	59.03%	Tramadol	1960
	00.0404		
% AHOP CS Purchases	86.01%		





تلتك	A DECISION	
	Increase SOM Limits	
	Decrease SOM Limits	
	QRA Site Visit	
	Sales Site Visit	



Case: 1:17-md-02804-DAP Doc #: 2371-36 Filed: 08/14/19 5 of 14. PageID #: 386819

#### Rausch, Nicholas

From: Saul, Amy

Sent: Monday, January 19, 2009 2:00 PM

To: Rausch, Nicholas; Dunham, Jennifer

Cc: Rymiszewski, Phil; Farley, Paul; Mone, Michael

Subject: RE: CVS Store for Review

#### Nick.

I just spoke to the pharmacist who submits C2 orders. He states there was a new pain clinic that opened a few blocks away. He is not sure when it opened. It is called Atlantic Medical Solutions (?) and he believes it is in the 900 block of North Federal Highway.

#### **Amy Saul**

Cardinal Health Dublin, OH National Accounts Retail Phone 614-757-6554 Fax 614-553-5544

From: Rausch, Nicholas

Sent: Monday, January 19, 2009 9:44 AM

To: Dunham, Jennifer

Cc: Rymiszewski, Phil; Farley, Paul; Mone, Michael; Saul, Amy

Subject: RE: CVS Store for Review

Jennifer,

One additional item to note is that the store's purchases of Oxycodone products changed in June of 2008. Could you please find out what happened?

Thanks!

Nick

From: Rausch, Nicholas

Sent: Monday, January 19, 2009 9:29 AM

To: Dunham, Jennifer

Cc: Rymiszewski, Phil; Farley, Paul; Mone, Michael; Saul, Amy

Subject: CVS Store for Review

Jennifer,

Our DC personnel identified an order placed by a CVS store for Oxycodone products that warranted additional review. Specifically, CVS 02848 (DEA BF7368308) located in Pompano Beach, FL ordered 60 bottles of 100 count OXYCODONE HCL (NDC 00406853001). Although the quantity ordered did not create a threshold limit, the number of bottles ordered of this specific product varies from the store's normal purchase pattern.

We have reviewed this order here at Corporate and have determined that the store's purchases of Oxycodone products warrant additional review. Could you please reach out to CVS and ask that they review the Oxycodone purchases made by this store and let us know if: 1) the order was made in error; and/or 2) if their have been substantial utilization changes at the store?

Page 2 of 2 Case: 1:17-md-02804-DAP Doc #: 2371-36 Filed: 08/14/19 6 of 14. PageID #: 386820

#### Thanks!

Nicholas Rausch Manager, Regulatory Management Cardinal Health 7000 Cardinal Place Dublin, Ohio 43017 614-757-3148 tel 614-652-8781 fax

Case: 1:17-md-02804-DAP Doc #: 2371-36 Filed: 08/14/19 7 of 14. PageID #: 386821

#### Rausch, Nicholas

From: Saul, Amy

Sent: Monday, January 19, 2009 2:00 PM

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Cc: Rymiszewski, Phil; Farley, Paul; Mone, Michael

Subject: RE: CVS Store for Review

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Page 2 of 2 Case: 1:17-md-02804-DAP Doc #: 2371-36 Filed: 08/14/19 8 of 14. PageID #: 386822

#### Thanks!

Nicholas Rausch Manager, Regulatory Management Cardinal Health 7000 Cardinal Place Dublin, Ohio 43017 614-757-3148 tel 614-652-8781 fax

Case: 1:17-md-02804-DAP Doc #: 2371-36 Filed: 08/14/19 9 of 14. PageID #: 386823

#### Rausch, Nicholas

From: GMB-QRA-Anti-Diversion

**Sent:** Friday, January 16, 2009 11:29 AM

To: Mone, Michael; Forst, Christopher; Rausch, Nicholas

Subject: FW: Order of Interest BF7368308

Importance: High

From: Kurtz, Bob

Sent: Thursday, January 15, 2009 5:49 PM

To: Butler, Joyce; Simmons, Pam; GMB-QRA-Anti-Diversion

Subject: Order of Interest BF7368308

Importance: High

Customer # 024829 ordered a quantity of 60 of item # 3591377. This would have exceeded their previous months total by 18 bottles of 100.

Considering it is only the 15th of the month, I reduced the quantity of the ordered item by 24.

## Bob Kurtz

Operations Supervisor Lakeland Division-HSCS 863-686-3784 x7404

# **Anti-Diversion Early Dialogue Profile**

By Christopher J. Forst at 11:16 am, May 27, 2010

**EAST** 

HOLIDAY CVS, L.L.C. BF7368308

BF7368308

DEA LICENSE INFORMATION

DEA Number:

Business Activity Code:	A 3	CHAIN PHAR	MACY	
DEA Schedules:	22N 33N 4 5			
License Expiration Date:	20101231	200000000000000000000000000000000000000	######################################	100000000000000000000000000000000000000
CUSTOMER INFORMAT	ION	000000000000000000000000000000000000000		300000000000000000000000000000000000000
HOLIDAY CVS, L.L.C.		DBA: CVS/PHAR	RMACY # 0284	8
2036 E. ATLANTIC BLVD.				
POMPANO BEACH	FL	33060 9	9547816785	9547816785
Dominant Accounting Class	: CHAIN PHARM	ACY	cvs	
First Cardinal Account Crea	ted: 12/7/2007			
Visited by QRA / # of Visits /				
Visited by QRA / # of Visits / PURCHASE PROFILE The below metrics are aggregated	Most Recent Visit:			5.280
Visited by QRA / # of Visits / PURCHASE PROFILE The below metrics are aggregated # of Drug Families Purchase	Most Recent Visit:	Hydroc	odone	5,280 496,490
Visited by QRA / # of Visits / PURCHASE PROFILE The below metrics are aggregated # of Drug Families Purchase Total Rx Sales (\$):	Most Recent Visit:  based on the previous 1.  d: 51		odone odone	×
Visited by QRA / # of Visits / PURCHASE PROFILE The below metrics are aggregated # of Drug Families Purchase Total Rx Sales (\$): Control Substance (CS) Sale	Most Recent Visit:  based on the previous 1.  d: 51	Hydrod Oxyocd Alprazo	odone odone olam	496,490
Visited by QRA / # of Visits / PURCHASE PROFILE The below metrics are aggregated # of Drug Families Purchase Total Rx Sales (\$): Control Substance (CS) Sale Rx Dosage Units Sold	Most Recent Visit:  based on the previous 1.  d: 51	Hydrod Oxyocd Alpraze 4 Phente	odone odone olam rmine	496,490 4,100
First Cardinal Account Creat Visited by QRA / # of Visits /  PURCHASE PROFILE The below metrics are aggregated # of Drug Families Purchase Total Rx Sales (\$): Control Substance (CS) Sale Rx Dosage Units Sold CS Dosage Units Sold: % CS Purchases	based on the previous 1.  based (\$1.)  ps (\$):	Hydrod Oxyoco Alprazo  Phente Carlso	odone odone olam irmine prodol	496,490 4,100 700

EARLY DIALC	GUE INFO	RMATION		
Drug Family:	9143	OXYCODONE	HYDROCHLOI	RIDE
Allocated Accru	ıal:			
Threshold Limit	t.			
% of Limit:				
Previous Month	Max:			
% Variance (Ma	x):			
			000000000000000000000000000000000000000	
HISTORICAL	PURCHASE	DATA		
May 09	31,500	Nov 09	47,200	
Jun 09	40,400	Dec 09	55,300	
Jul 09	43,100	Jan 10	35,500	
Aug 09	54,200	Feb 10	31,500	
Sep 09	48,480	Mar 10	33,460	
Oct 09	39,740	Apr 10	36,110	
DISTRACK IN	FORMATIO	N		
K02	LK			
11 BF73	68308	9143		
\$				
REGIONAL DI				
Region:	South	South	n Atlantic	
County / Popula	ition:	BROWAR	D	1,623,018
Population of Z	ip Income / H	lousehold Me	dian Age	
33,389	\$34,0	060.00	36.10	



QRA DECISION
Increase SOM Limits
Decrease SOM Limits
QRA Site Visit
Sales Site Visit
Increase SOM Limits  Decrease SOM Limits  QRA Site Visit  Sales Site Visit



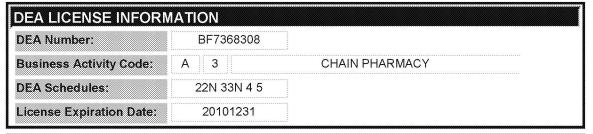
### Case: 1:17-md-02804-DAP Doc #: 2371-36 Filed: 08/14/19 11 of 14. PageID #: 386825

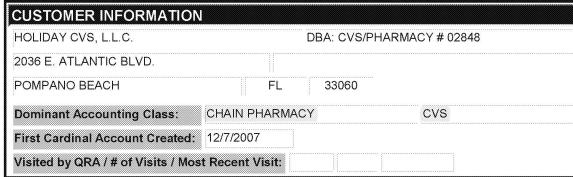
## **Anti-Diversion Customer Profile**

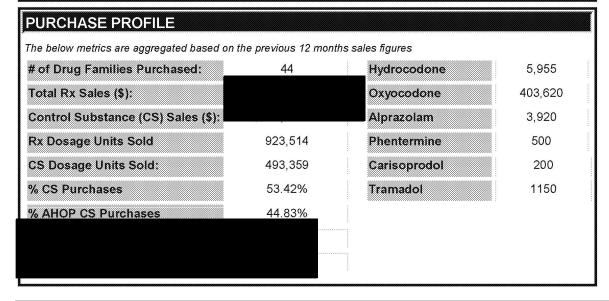
BF7368308 HOLIDAY CVS, L.L.C.

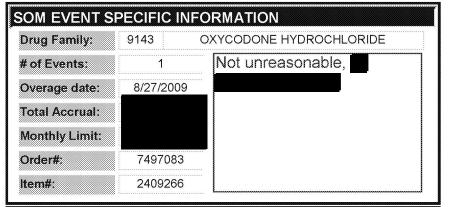
## REVIEWED

By Christopher J. Forst at 9:58 am, Aug 28, 2009







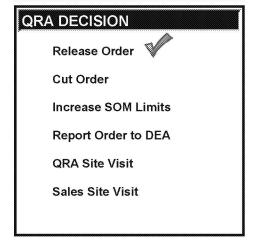


HISTORICAL	PURCHASE	DATA	
Aug 08	35,250	Feb 09	36,500
Sep 08	23,640	Mar 09	16,990
Oct 08	25,950	Apr 09	41,900
Nov 08	29,730	May 09	31,500
Dec 08	39,860	Jun 09	40,400
Jan 09	38,800	Jul 09	43,100

11 DI 7	308308 9	140	***************************************
REGIONAL D	EMOGRAPHI	CS	
Region:	South	South Atlanti	С
County / Popul	ation:	BROWARD	1,623,018
Population of 2	Zip Income / Ho	ousehold Median Ag	je –
33,389	\$34,06	36.1	0

24829







DISTRACK INFORMATION

K02

# **Anti-Diversion Customer Profile**

REVIEWED

By Christopher J. Forst at 11:36 am, Sep 01, 2010

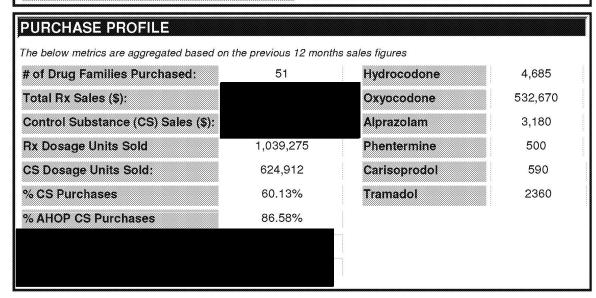
**EAST** 

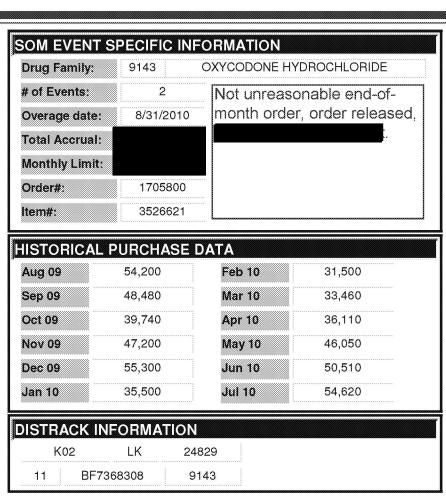
BF7368308 HOLIDAY CVS, L.L.C.

First Cardinal Account Created: 1/1/2001

Visited by QRA / # of Visits / Most Recent Visit:

DEA Number:	BF7368308		
Business Activity Code:	A 3	CHAIN PHARMACY	
DEA Schedules:	22N 33N 4 5		
License Expiration Date:	20101231		
	#0000000000000000000000000000000000000		
CUSTOMER INFORMA	TION		
	TION	DBA: CVS/PHARMACY # 02848	
CUSTOMER INFORMA HOLIDAY CVS, L.L.C. 2036 E. ATLANTIC BLVD.	ATION	DBA: CVS/PHARMACY # 02848	





Region:	South		South Atlantic	
County / Popula	ition:	BRC	WARD	1,623,018
Population of Z	ip Income	/ Household	Median Age	
33,389	\$3	34,060.00	36.10	



QRA DECISION
Release Order
Cut Order
Increase SOM Limits
Report Order to DEA
QRA Site Visit
Sales Site Visit



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9/1/2010 8:04:23 AM

## Case: 1:17-md-02804-DAP Doc #: 2371-36 Filed: 08/14/19 13 of 14/ PageID #: 386827 **Anti-Diversion Early Dialogue Profile**

1,623,018

By Christopher J. Forst at 9:46 am, Sep 24, 2010

**EAST** 

HOLIDAY CVS, L.L.C. BF7368308

DEA LICENSE INFORMATION				EARLY DIAL	OGUE INFO	RMATION	
DEA Number: BF736	8308			Drug Family:	9143	OXYCODONE HYD	OROCHLORIDE
Business Activity Code: A 3	CH	HAIN PHARMACY		Allocated Acci	rual:		
DEA Schedules: 22N 3	3N 4 5			Threshold Lim	it:		
License Expiration Date: 20101	231			% of Limit:			
CUSTOMER INFORMATION				Previous Mont	h Max:		
HOLIDAY CVS, L.L.C.	DRA	: CVS/PHARMACY # 0284	8	% Variance (M	ax):		
2036 E. ATLANTIC BLVD.				000			
POMPANO BEACH	FL 33	3060 9547816785	9547816785	HISTORICAL	PURCHASI	E DATA	500000000000000000000000000000000000000
Dominant Accounting Class: CHA	IN PHARMACY	CVS		Sep 09	48,480	Mar 10	33,460
First Cardinal Account Created: 1/1/2	XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX	3.0		Oct 09	39,740	Apr 10	36,110
Visited by QRA / # of Visits / Most Rec				Nov 09	47,200	May 10	46,050
				Dec 09	55,300	Jun 10	50,510
PURCHASE PROFILE				Jan 10	35,500	Jul 10	54,620
The below metrics are aggregated based on th	e previous 12 months	sales figures		Feb 10	31,500	Aug 10	43,520
# of Drug Families Purchased:	44	Hydrocodone	5,385				
Total Rx Sales (\$):		Oxyocodone	521,990	DISTRACK II		N	
Control Substance (CS) Sales (\$):		Alprazolam	3,080	K02	LK		
Rx Dosage Units Sold	1,045,601	Phentermine	500	11 BF7	368308	9143	
CS Dosage Units Sold:	618,980	Carisoprodol	590	DEGLOVAL E	NEW CODAD	III.O.	
% CS Purchases	59.20%	Tramadol	2160	REGIONAL D	South	South Atl	antio
% AHOP CS Purchases	85.78%			County / Popu		BROWARD	1,6
				Population of 33,389			<b>n Age</b> 36.10



QRA DECISION
Increase SOM Limits
Decrease SOM Limits
QRA Site Visit
Sales Site Visit



# **Anti-Diversion Customer Profile**

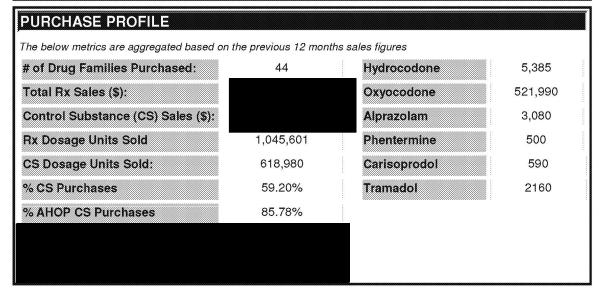
By Christopher J. Forst at 3:33 pm, Oct 13, 2010

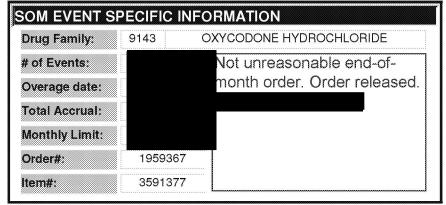
**EAST** 

BF7368308 HOLIDAY CVS, L.L.C.

DEA LICENSE INFORM	ATION	
DEA Number:	BF7368308	
Business Activity Code:	A 3	CHAIN PHARMACY
DEA Schedules:	22N 33N 4 5	
License Expiration Date:	20101231	

CUSTOMER INFORMATION									
HOLIDAY CVS, L.L.C.			DI	DBA: CVS/PHARMACY # 02848					
2036 E. ATLANTIC BLVD.									
POMPANO BEACH		FL		33060	9547816785		9547816785		
Dominant Accounting Class:	CHAIN P	HARM	4CY		cvs				
First Cardinal Account Created:	1/1/2001								
Visited by QRA / # of Visits / Mos	t Recent \	/isit:							

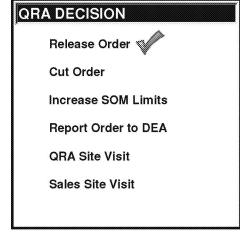




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Feb 10	31,500	Aug 10	43,520

	NU2		LN	24029					
	11	BF7368	308	9143					
=)	EGION <i>i</i>	71 DEM	IOGRA	PHICS					ī
	Region:		South	i ii ee	South Atlantic				
County / Population:			in:	BROWARD				1,623,018	
	Populatio	n of Zip	Income	/ Househo	old	Median Age			
	33,3	89	\$34,060.00			36.10			







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DISTRACK INFORMATION

1 IZ

10/1/2010 7:56:32 AM